

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
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April 1, 2020

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
 Remedial Project Manager
 Institutional Controls Coordinator
 U.S. Environmental Protection Agency Region 5
 77 West Jackson Boulevard (SR-6J)
 Chicago, IL 60604

Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 57 (January-March 2020)

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from January-March 2020.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Institutional Controls:** During the January-March 2020 period, the Group’s project coordinator spoke to the City of Venice’s attorney in regard to the roadways ordinances. The Group’s project coordinator also spoke to EPA’s project manager about the status of institutional controls activities. Subsequently, the Group requested a meeting with EPA to discuss institutional controls activities and unresolved issues related to several remote fill properties.
- **Slough Road:** At the request of Beelman Truck Co., the Group’s project coordinator responded to inquiries from Ameren in regard to the remedial activities performed at Slough Road. Ameren requested the information related to its efforts to relocate an electrical transmission structure near Slough Road.
- **Operation and Maintenance:** During the January-March 2020 period, the following operation and maintenance activities were performed at the site:

January 28	On the Group’s behalf, the Group’s project coordinator authorized Munie Greencare Professionals (“Munie”) to perform mowing and vegetation control services on the 16th and State Street properties in Granite City in 2020.
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- **Project Coordination:** During the January-March 2020 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

January 2	Submitted Quarterly Progress Report 56 to EPA.
January 8	Sent an email and letter to EPA to provide Johnson Controls International PLC's Form 10-K to satisfy the Group's financial assurance requirements of the Consent Decree.
January 30	Spoke to Casper Nighohossian, Esq., Venice attorney, in regard to the roadways ordinance.
February 14	Sent an email to the City of Venice's attorney to provide documents regarding the roadways ordinances.
February 20	Sent an email to Ameren to provide information regarding the location of Slough Road, the remedial activities performed at Slough Road, and the Group's efforts to implement institutional controls for Slough Road. The information was provided in response to Ameren's February 19 request and related to Ameren's efforts to relocate an electrical transmission structure near Slough Road. The information was also provided to EPA.
March 2	Sent an email to Ameren to provide additional information about Slough Road and the location of the paved roadway. The information was also provided to EPA.
March 5	Sent an email to EPA to provide confirmation of payment of EPA's December 4, 2019 bill.
March 9	Spoke to EPA's project manager about the status of institutional controls and the potential for a meeting to discuss unresolved issues.
March 12	Sent an email to EPA's project manager in regard to potential dates for a meeting to discuss institutional controls issues.
March 25	Responded to Ameren's inquiry for additional information related to Sough Road. The Group's response was also provided to EPA.
March 27	Communicated with EPA's project manager in regard to changes to the meeting schedule as a result of COVID-19 issues.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- Not applicable during this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group's representatives will continue to perform operation and maintenance activities at the site, as required. As part of the Group's operation and maintenance activities, the Group anticipates that additional discussions will occur with EPA related to operation and maintenance activities for several remote fill properties.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will address comments, if any are received, on the draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019.
- The Group will address EPA's comments, if any are received, on the revised draft environmental covenants submitted to EPA and Illinois EPA in May 2019.
- The Group will address EPA's comments, if any are received, on the draft administrative records and supporting documents for the 15 denied access residential properties, which were submitted to EPA in March 2019.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive, Non-Responsive, and Non-Responsive) in June 2015 and one residential property Non-Responsive in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive) in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019 and examined the property with EPA and Illinois EPA during the November 2019 site visit. The Group anticipates that additional discussions will occur with EPA about this matter.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

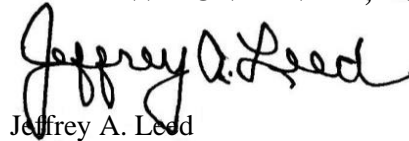
7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)